

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

MDL NO. 3:16-md-2738-FLW-LHG

JUDGE FREDA L. WOLFSON  
MAG. JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

Civil Action No. 3:18-cv-09122-FLW-LHG

*RICHARD ESTABROOK, et al. v.  
JOHNSON & JOHNSON, et al*

**UNOPPOSED MOTION TO FILE FIRST AMENDED COMPLAINT**

Richard Estabrook, as the Personal Representative of the Estate of Sharon Rae Johnston, moves the Court for an Order allowing him to file the First Amended Complaint correcting a typographically errors in his originally filed complaint on May 11, 2018 as to ‘Injury to the Person Represented’ is correctly identified, all counts against Imerys Talc and PCPC are removed, and Count XXIII: Survival Action against all Defendants which was inadvertently left unchecked on his original complaint under Causes of Action page 7 is now correctly reflected.

1. A proposed First Amended Complaint correcting this error is attached hereto as **Exhibit A.**

2. Plaintiff’s counsel has met and conferred with Defendants’ counsel, who has indicated Defendants do not oppose the motion.

WHEREFORE, counsel for Plaintiff Richard Estabrook respectfully requests that this Court grant this request and allow Plaintiff to file his First Amended Complaint.

DATED: December 9, 2020

Respectfully Submitted,

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